

7. VFC COMPLIANCE SITE VISITS

Overview

The CDC requires the Immunization Program to periodically visit VFC providers to assess compliance with program requirements. These visits are called VFC compliance site visits or simply “site visits.”

The goal of the Montana Immunization Program is to ensure provider compliance through effective communication, and a site visit should be considered more of an educational opportunity than an “audit.” Most program compliance issues are addressed through education. Only cases of repeated and intentional non-compliance progress to advanced stages of corrective action. Please refer to Section 9 for more details on how non-compliance, fraud, and abuse are handled in the Montana VFC Program.



Self-Assessment

We encourage you to continuously assess your VFC compliance, especially prior to a site visit, by using the checklist in Section 8 – VFC Program Requirements. This list details the main requirements of the VFC Program and references sections of this handbook for more information.

Site Visit Process

VFC providers in Montana can expect a site visit from the Montana Immunization Program **every other year**, typically in the spring, summer, or early fall.

VFC site visits may be combined with other assessment functions of the Montana Immunization Program such as AFIX visits, where facility immunization rates are determined. Only VFC compliance site visit procedures are outlined in this handbook.

Site Visit Preparation

1. Approximately one month prior to your visit, a Montana Immunization Program staff member will contact you by telephone or email to schedule the visit.
2. After the visit is scheduled, you will receive a letter confirming the date and detailing items needed before and during the visit.

During the Site Visit

3. Site visits can take from 1 to 4 hours depending on the size of your clinic, whether other assessment activities are performed, and the compliance issues that arise.
4. Please make the following available during the visit:
 - a. The Vaccine Manager and any key staff involved in the VFC Program
 - b. A work space large enough for a laptop computer
 - c. Three months of temperature logs and Data Logger data from your vaccine storage units
 - d. Your completed and annually reviewed *Vaccine Management Plan*
 - e. VFC eligibility screening documentation (if not recorded in imMTrax)
 - f. Borrowing reports (if applicable)
 - g. Your paper stock or electronic source of VISs
 - h. Any VFC-related documentation requested during the visit.
5. Approximately one hour of the site visit will be one-on-one with your vaccine manager. Immunization Program staff will ask questions pertaining to the practices at your facility for implementing the VFC Program. They will also inspect your vaccine storage units.
6. After the one-on-one with the vaccine manager, the Immunization Program staff can work independently as they enter data into their computer.
7. At the end of the visit, you will receive feedback on your compliance with the VFC Program and a list of any required corrective action plans and deadlines for completion.

Site Visit Follow-Up

8. Within one month of your visit, you will receive a follow-up letter from the Immunization Program detailing the results of your VFC visit. It will reiterate any VFC compliance issues, corrective action plans, and deadlines from your site visit.
9. In order to remain in good standing with the VFC Program, you must carry out corrective actions by the deadline. Immunization Program staff will follow up by telephone and email.
10. Immunization Program staff may return to your facility for an educational site visit to address major or complex VFC non-compliance issues.

Other Visits from the Montana Immunization Program

- **Unannounced Storage and Handling Visits** – The CDC requires the Immunization Program to perform unannounced “spot check” visits throughout the year. Any active VFC Provider could receive an unannounced visit. The visit will take no longer than 30 minutes and will focus on vaccine storage and handling practices, including an inspection of the VFC vaccine storage units at your facility.
- **Educational Visits** – Educational visits are those where the main purpose is education and not assessing compliance.

- **Provider Request** – Providers may request an educational visit from the Montana Immunization Program at any time. Educational visits are useful when there has been a change in staff, location, or management. Educational visits are dependent on availability of Immunization Program staff and can also be conducted by telephone or web conferencing.
- **Non-Compliance Response** – An educational visit may occur in response to provider non-compliance. The visit will focus on correcting the specific compliance issue.
- **Enrollment Visits** – Enrollment visits occur during the enrollment process, See Section 2 – Provider Enrollment for more information on VFC Program enrollment.